IN THE UNITED STATES DISTRICT COURT FOR THE WESTERN DISTRICT OF TEXAS SAN ANTONIO DIVISION

VOLT POWER, LLC	§	
	§	
Plaintiff,	§	
	§	
VS.	§	Civil Case No.: 5:21-cv-216
	§	
AXIS POWER, LLC, JUSTIN	§	
GRAHAM, ALEX GRAHAM,	§	
SAMUEL "SAMMY" CHRISTIAN,	§	
ALFREDO "FREDDY" CHAVEZ,	§	
DANIEL WELCH, LANCE BROWN,	§	
ARCH MANAGEMENT SERVICES,	§	
LLC, BRANDON CODY GRAHAM,		
AND DAVID COLEMAN		

JOINT MOTION FOR TEMPORARY STAY OF PROCEEDINGS TO CONDUCT MEDIATION

Plaintiff Volt Power, LLC ("Volt") and Defendants Axis Power, LLC, Arch Management Services, LLC, Cody Graham, Justin Graham, Alex Graham, Samuel "Sammy" Christian, Alfredo "Freddy" Chavez, Daniel Welch, and Lance Brown (collectively, the "Parties"), file this Joint Motion for Temporary Stay of Proceedings to Conduct Mediation and respectfully show the Court as follows:

1. The Parties are finalizing discovery and have agreed to mediate this case once discovery is substantially complete. Presently, the Parties are working towards selecting a mutually agreeable date to conduct the mediation. The Parties also agree that to conserve judicial and Party resources and to allow the Parties sufficient time to mediate the case, a stay of all proceedings and deadlines, along with any other accompanying case activity, is warranted. The Parties will jointly notify the Court in writing within five (5) days following an informal resolution of this case or following the declaration of an impasse, or by January 30, 2023, whichever is earlier.

2. In light of the foregoing, the Parties respectfully request that the Court enter a stay of this case to allow the Parties to attempt to resolve the case through out-of-court mediation. A proposed order is attached.

Respectfully submitted,

OGLETREE, DEAKINS, NASH, SMOAK & THE LAW OFFICES OF OLIVA, SAKS, GARCIA STEWART, P.C.

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